

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

Daniel J. Stout :
: Docket No. 18-03530-ref
:
FREEDOM MORTGAGE Corporation : Chapter 13
Movant :
Vs. :
:
Daniel J. Stout :
Respondents :
:

RESPONSE TO MOTION FOR
RELIEF FROM STAY

AND NOW, comes the Respondent, Daniel J. Stout, by and through his undersigned counsel, Michael J. McCrystal, Esquire and avers:

1. Admitted.
2. Admitted .
3. Admitted.
4. Denied this averment is strictly denied and it is averred to the contrary
5. See answer to averment number 4.
6. See answer to averment number 4.
7. Denied this averment is strictly denied and it is averred to the contrary.

8. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure.

9. Averment no. 9 does not state an averment of fact or law.

10. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure.

11. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure.

12. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure.

13. Averment no. 13 does not state an averment of fact or law.

WHEREFORE, Respondent prays this Honorable Court to Deny the Motion for Relief from Stay and for such other and further relief as this Honorable Court will deem just and equitable.

Respectfully submitted,

/s/ Michael J. McCrystal

Michael J. McCrystal, Esquire

Supreme Court ID No. 55064

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